

Exhibit 4

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF MARYLAND

3 KAMEL B. JONES, JR. *

4 8655 Graves Ave, Apt 86

* Civil Action No.:

5 Santee, California 92071

* 22CV2628-JRR

6 Plaintiff *

7 V *

8 THE CITY OF SALISBURY, MARYLAND *

9 The Salisbury Police Department *

10 699 W. Salisbury Parkway *

11 Salisbury, Maryland 21801 *

12 and *

13 BARBARA DUNCAN *

14 Salisbury City Chief of Police *

15 699 W. Salisbury Parkway *

16 Interview of KAMEL B. JONES, JR.

17 By CAPTAIN RYAN KOERNER

18 Monday, May 3, 2021

19 1:39 p.m.

20 Job: 470856

21 Pages: 1 - 24

22 Transcribed by: Steph Mistele

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1 KAMEL B. JONES, JR.: Hm-hmm.

2 CAPTAIN KOERNER: However, because you are not a
3 sworn law enforcement officer, the bottom line does
4 not pertain to you. But what I will do is, I will
5 read it so you understand it. If you are-- and it
6 says, if you are an accused, this does not preclude
7 you from consulting with legal counsel regarding your
8 role in this incident. Okay?

9 KAMEL B. JONES, JR.: Hm-hmm.

10 CAPTAIN KOERNER: That is a right afforded by
11 the Law Enforcement Officer Bill of Rights. And
12 because you're not sworn, you're not afforded that,
13 okay?

14 KAMEL B. JONES, JR.: Hm-hmm.

15 CAPTAIN KOERNER: You're not being accused of a
16 crime--

17 KAMEL B. JONES, JR.: Hm.

18 CAPTAIN KOERNER: --okay, so. What's your--
19 what's your ID number, Kamel?

20 KAMEL B. JONES, JR.: 2733.

21 CAPTAIN KOERNER: Okay. So, what I need from you
22 is I need you to sign right down there and date and

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1 time it and I will witness it.

2 KAMEL B. JONES, JR.: You said May 3rd, yeah?

3 CAPTAIN KOERNER: Yep, May the 3rd. And the time
4 is now 13:42 (inaudible). Thank you. Okay. So, the
5 way this goes is basically, I ask you several
6 questions. I just ask you to be honest. Okay? Were
7 you working in the Communications Room on Thursday,
8 April the 28th?

9 KAMEL B. JONES, JR.: Yes.

10 CAPTAIN KOERNER: Okay. Which work station were
11 you assigned for the shift? So, like, if you walk
12 into Communications, obviously the watch commander is
13 to the left, and then there's--

14 KAMEL B. JONES, JR.: Station 2.

15 CAPTAIN KOERNER: You're Station 2? And which
16 one is that?

17 KAMEL B. JONES, JR.: That's-- as soon as you
18 walk in, you have the middle-- towards the center of
19 the room, it's to the right.

20 CAPTAIN KOERNER: Who else was working in the
21 Communications Room with you that day? Other
22 dispatchers, officers, supervisor, etc.

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1 lobby?

2 KAMEL B. JONES, JR.: Officially it was me, but
3 it was-- we got the call from the troop-- from MSP.

4 CAPTAIN KOERNER: You got the call from MSP?

5 KAMEL B. JONES, JR.: Yes. So, I guess a trooper
6 was riding by and he radioed into his communications,
7 like, hey, can you notify SPD that I have a female
8 who's partially naked is about to walk in the lobby?
9 And their PCO-- their PCO came over the intercom,
10 like, hey, city, just giving you a heads up, blah,
11 blah, blah. And that's how we know-- that's how we
12 got-- we were aware of it. PCO Polk (phonetic) was
13 the dispatcher that (inaudible).

14 CAPTAIN KOERNER: Polk?

15 KAMEL B. JONES, JR.: Yes.

16 CAPTAIN KOERNER: Was there anybody else in the
17 lobby? Any other patrons or anything?

18 KAMEL B. JONES, JR.: No. No, sir.

19 CAPTAIN KOERNER: Okay. What did you observe the
20 woman do? Like, what was going on?

21 KAMEL B. JONES, JR.: In the beginning, she-- to
22 the best of my recollection, she was just walking

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1 around talking incoherently. And then, she started
2 throwing chairs around, so that's when I came across
3 the radio, I need (inaudible) to the front
4 (inaudible) who is partially naked. We had two
5 officers in the back. They started going and officers
6 off the room started coming in. And at the time, when
7 Officer (inaudible)-- when officers beginning to walk
8 past the Communications to the front lobby, the lady
9 was just laying down flat on the ground.

10 CAPTAIN KOERNER: Did you call EMS or anything?

11 KAMEL B. JONES, JR.: I personally didn't, but
12 later on it was called. PCO Boldt called them.

13 CAPTAIN KOERNER: Were the CCTV monitors working
14 in the Communications Room?

15 KAMEL B. JONES, JR.: Yes.

16 CAPTAIN KOERNER: The one-- particularly the
17 ones that were focused on the lobby?

18 KAMEL B. JONES, JR.: Yes.

19 CAPTAIN KOERNER: Did you happen to take a
20 photograph of one of the CCTV monitors?

21 KAMEL B. JONES, JR.: Yes.

22 CAPTAIN KOERNER: Which monitor and what was the

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1 caption at the time you took the photograph?

2 KAMEL B. JONES, JR.: Like, which camera or
3 which monitor?

4 CAPTAIN KOERNER: Which monitor and what was
5 that monitor capturing (inaudible)?

6 KAMEL B. JONES, JR.: Okay, so, the monitor at
7 Station 2. It was the front lobby camera and it was
8 capturing a lady laying down on the ground.

9 CAPTAIN KOERNER: Well, what-- she was partially
10 naked. What was she wearing?

11 KAMEL B. JONES, JR.: A jacket/sweater, so
12 something of that sort.

13 CAPTAIN KOERNER: And anything else on her
14 bottom?

15 KAMEL B. JONES, JR.: No. I think the jacket may
16 have come halfway down to cover her vagina area, but
17 I think rose up while she was lying down or whatever.

18 CAPTAIN KOERNER: What device did you use to
19 take the photograph?

20 KAMEL B. JONES, JR.: My cell phone.

21 CAPTAIN KOERNER: Do you have that device with
22 you now?

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1 KAMEL B. JONES, JR.: Yes, sir.

2 CAPTAIN KOERNER: What app did you use to take
3 the photograph? It's-- or apps? Your--

4 KAMEL B. JONES, JR.: I took the-- I took the
5 photo with my camera, but it was sent out on-- via
6 Snapchat.

7 CAPTAIN KOERNER: Any other social media app?

8 KAMEL B. JONES, JR.: No, sir.

9 CAPTAIN KOERNER: Snapchat not (inaudible). Is
10 the photo saved to your phone still?

11 KAMEL B. JONES, JR.: No.

12 CAPTAIN KOERNER: Did you text message, email in
13 any way, shape or form or send the photograph to
14 anyone else?

15 KAMEL B. JONES, JR.: Anyone-- what do you mean
16 anyone else?

17 CAPTAIN KOERNER: Did you send it via any other
18 format besides Snapchat?

19 KAMEL B. JONES, JR.: Oh, I texted it to my
20 corporal. Corporal Foy.

21 CAPTAIN KOERNER: Okay. You said you sent it out
22 via Snapchat. Who did that Snapchat go out to?

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1 KAMEL B. JONES, JR.: Officers of the
2 department.

3 CAPTAIN KOERNER: Yeah, do you know who
4 specifically?

5 KAMEL B. JONES, JR.: I can-- it was Milt
6 (phonetic), Ross (phonetic), Dean (phonetic).

7 CAPTAIN KOERNER: Kyle Dean or Dean Popovich
8 (phonetic)?

9 KAMEL B. JONES, JR.: Oh, Poppy. Astrich
10 (phonetic), of course, Foy. To the best of my
11 recollection, I believe that's it. I know
12 (inaudible).

13 CAPTAIN KOERNER: Did you send the photograph to
14 anyone who is not an employee of the Salisbury Police
15 Department?

16 KAMEL B. JONES, JR.: No. I'm sorry, I do want
17 to add something.

18 CAPTAIN KOERNER: Okay.

19 KAMEL B. JONES, JR.: So, the way-- are you
20 familiar with Snapchat?

21 CAPTAIN KOERNER: Somewhat.

22 KAMEL B. JONES, JR.: Okay. So, Snapchat--

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1 CAPTAIN KOERNER: I don't have it.

2 KAMEL B. JONES, JR.: Okay. So, when you post--
3 you have different stories on your Snapchat, which
4 have different privacy settings.

5 CAPTAIN KOERNER: Right.

6 KAMEL B. JONES, JR.: So, my main story's open
7 to anyone and everyone. But there is a private story
8 that just says cops and it has a police emblem on it.

9 CAPTAIN KOERNER: Hm-hmm.

10 KAMEL B. JONES, JR.: That's just for officers
11 because I post police memes, you know.

12 CAPTAIN KOERNER: Right.

13 KAMEL B. JONES, JR.: Because the public can get
14 the memes and stuff.

15 CAPTAIN KOERNER: Right.

16 KAMEL B. JONES, JR.: I accidentally posted on
17 the cop website-- or not website, the cop story,
18 which is private to only officers.

19 CAPTAIN KOERNER: Only officers here...or?

20 KAMEL B. JONES, JR.: No. Only officers who are
21 on the Snapchat. There are other officers who are no
22 longer here. It was caught within five to seven

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1 minutes--

2 CAPTAIN KOERNER: And--

3 KAMEL B. JONES, JR.: --but whether they seen it
4 or not, I obviously can't say. Does that make sense?

5 CAPTAIN KOERNER: Yeah.

6 KAMEL B. JONES, JR.: Okay.

7 CAPTAIN KOERNER: But Snapchat automatically
8 deletes unless you screenshot it, right?

9 KAMEL B. JONES, JR.: Correct. And I would've
10 got notified if it was screenshotted.

11 CAPTAIN KOERNER: Really?

12 KAMEL B. JONES, JR.: Yes. They notify you when
13 you screen shot a screen, record, do any type of
14 manipulation. I'll wait until you're finished.

15 CAPTAIN KOERNER: No, that's okay. Go ahead.

16 KAMEL B. JONES, JR.: I also do want to add, I
17 did-- I didn't send a picture of the event. I sent,
18 like, a black screen or something (inaudible) to
19 other people who are not in the department, like,
20 hey, we just had this crazy lady walk into the front
21 lobby, but no picture was--

22 CAPTAIN KOERNER: No picture?

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1 notification so it was never (inaudible) out.

2 CAPTAIN KOERNER: And the only one you actually
3 sent it to directly was Foy?

4 KAMEL B. JONES, JR.: Via text, yes.

5 CAPTAIN KOERNER: Is the photograph still stored
6 on your phone--

7 KAMEL B. JONES, JR.: No. (inaudible).

8 CAPTAIN KOERNER: --or within any of your apps?

9 KAMEL B. JONES, JR.: No. It was deleted.

10 Sergeant Thompson saw me delete it the day of the
11 incident.

12 CAPTAIN KOERNER: What prompted you to take this
13 photograph in the first place? I mean, you got to
14 understand that. Like, what prompted you? What was
15 going through your mind when you took that
16 photograph?

17 KAMEL B. JONES, JR.: Honestly-- of course I'm
18 familiar with the policy and stuff. I-- to my own
19 ignorance. I just thought it was a joke, you know,
20 for people who-- for people who didn't witness it,
21 like, other people on calls or people in the
22 department.

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1 CAPTAIN KOERNER: Right.

2 KAMEL B. JONES, JR.: I know, of course, I would
3 never just (inaudible) it out to anyone outside of
4 law enforcement or any personal information, but I
5 just thought it was just kind of event that--

6 CAPTAIN KOERNER: And believe me, I'm the first
7 one to admit that, we in law enforcement have more of
8 a jaded sense of humor than the general public.

9 KAMEL B. JONES, JR.: Yes, sir.

10 CAPTAIN KOERNER: But do you understand the
11 potential liability for not only you, but the entire
12 agency if that photograph were to be released to the
13 general public?

14 KAMEL B. JONES, JR.: Yes, sir.

15 CAPTAIN KOERNER: Do you understand what kind of
16 position that puts us in as a command group, as an
17 agency because what's-- and I'm familiar with this
18 young woman, okay?

19 KAMEL B. JONES, JR.: Hm-hmm.

20 CAPTAIN KOERNER: I've seen her name a bunch of
21 times. But if someone of sound mind and sound body
22 were to get a hold of that photograph, she'd have a

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1 heck of a lawsuit. I mean, are we agreed on that?

2 KAMEL B. JONES, JR.: Yes.

3 CAPTAIN KOERNER: I mean, that-- you--

4 KAMEL B. JONES, JR.: I knew this before the
5 event because, you know, I'm getting a degree in
6 criminal justice and--

7 CAPTAIN KOERNER: Right.

8 KAMEL B. JONES, JR.: --political science, all
9 this stuff, so I knew it. But at the time, I thought
10 no harm, no foul, you know. It's a little joke, you
11 know.

12 CAPTAIN KOERNER: Right.

13 KAMEL B. JONES, JR.: I do fully understand the
14 consequences.

15 CAPTAIN KOERNER: Right. Okay. Do you have
16 anything to add? Any questions, comments for me?
17 Obviously this is internal, so we're taking it very
18 seriously because it is-- it's where we're at. I
19 mean, we got to evaluate every piece of this. That's
20 why I asked you so many questions about it.

21 KAMEL B. JONES, JR.: Hm-hmm.

22 CAPTAIN KOERNER: And you know, we have to take